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July 23, 2013

BY E-MAIL

The Honorable Sue L. Robinson
United States District Court
844 North King Street
Wilmington, DE 19801

Re: *Telecomm Innovations, LLC v. ATM Systems Corporation, et al.*,
C.A. No. 12-1265-SLR, C.A. No. 12-1268-SLR, C.A. No. 12-1269-SLR,
C.A. No. 12-1272-SLR, C.A. No. 12-1275-SLR, C.A. No. 12-1276-SLR,
C.A. No. 12-1277-SLR, C.A. No. 12-1280-SLR, C.A. No. 12-1327-SLR,
C.A. No. 12-1331-SLR, C.A. No. 12-1333-SLR, C.A. No. 12-1335-SLR,
C.A. No. 12-1337-SLR, C.A. No. 13-0907-SLR, C.A. No. 13-0908-SLR,
and C.A. No. 13-909-SLR

Dear Judge Robinson:

I represent defendants Ricoh Company, Ltd and TrendNet, Inc. and write with the consent of all defendants in these actions in connection with the Request for a Status Teleconference filed by plaintiff Telecomm Innovations, LLC in the sixteen related Telecomm matters at approximately 8:16 p.m. on Friday evening, July 19, 2013. Plaintiff states that it “notified counsel for Defendants regarding the facts described above, has provided each Defendant a copy of this Notice in advance of its submission to the Court” and asks the Court to schedule a teleconference “to seek the Court’s guidance regarding the Court’s preference for handling these procedural issues.”

Contrary to plaintiff’s Request, at least four defendants were not notified by plaintiff prior to receiving this filing. Some of the remaining parties received the supposed notification from plaintiff only by email after the close of business on Friday and less than one and one-half hours before the filing and others did not receive the email until hours after the

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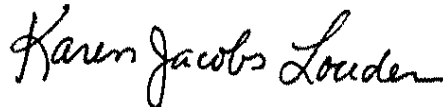
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filing itself. None of plaintiff's notifications, regardless of timing, however, satisfied the meet and confer requirements under the Local Rules.

Be that as it may, because all defendants just learned of the standing problems in cases pending for over nine months, and about plaintiff's proposed path forward, all defendants request a reasonable time to consult with their clients, obtain information from plaintiff regarding the defect in its title to the patents at issue and plaintiff's alleged cure, and then confer with the plaintiff as to the proper course of action. The parties may then file a joint statement regarding plaintiff's lack of standing and their proposal regarding the current and recently filed cases. Pending the parties filing a joint statement on plaintiff's lack of standing, defendants request that the Court continue the status conference set for August 29, 2013. By submission of this letter to the Court no defendant concedes or agrees that plaintiff's course of action was procedurally proper.

Respectfully submitted,

A handwritten signature in black ink that reads "Karen Jacobs Loudon". The signature is written in a cursive, flowing style.

Karen Jacobs Loudon (#2881)

KJL:pab

cc: All Counsel of Record (By Email)

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